

1	
2	
3	
4	
5	
6	
7	
8	
9	
L 0	
L 1	
L 2	
L 3	
L 4	
L 5	
L 6	
L 7	
L 8	
L 9	
20	
21	
22	
23	
24	
25	


---

January 24, 2023

Page 1

<p>1 APPEARANCES</p> <p>2</p> <p>3 FOR THE PLAINTIFF:</p> <p>4 Mr. Mauricio Guevara</p> <p>5 THE BUZBEE LAW FIRM</p> <p>6 600 Travis, Suite 7300</p> <p>7 Houston, Texas 77002</p> <p>8 Tel: 713.223.5393 Fax: 713.223.5909</p> <p>9 Mguevara@txattorneys.com</p> <p>10</p> <p>11 FOR THE DEFENDANT:</p> <p>12 Mr. Karl A. Schulz</p> <p>13 COZEN O'CONNOR</p> <p>14 1221 McKinney, Suite 2900</p> <p>15 Houston, Texas 77010</p> <p>16 Tel: 832.214.3900 Fax: 832.214.3905</p> <p>17 Kschulz@cozen.com</p> <p>18</p> <p>19 ALSO PRESENT:</p> <p>20 The Videographer: Mr. Kenny Parker</p> <p>21 The Paralegal: Mr. Lonn Parsons</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 2</p>	<p>1 THE VIDEOGRAPHER: Good morning. Today is</p> <p>2 Tuesday, January the 24th, 2023. We are on the record</p> <p>3 at 9:31 a.m. This is the video recorded deposition of</p> <p>4 Jaasin Taylor in the matter of Jaasin Taylor versus Ball</p> <p>5 Corporation in the United States District Court,</p> <p>6 Southern District of Texas, Houston Division.</p> <p>7 My name is Kenny Parker. I am a certified</p> <p>8 legal video specialist here on behalf of Veritext Legal</p> <p>9 Solutions. The court reporter is Patricia Palmer, also</p> <p>10 present on behalf of Veritext.</p> <p>11 At this time, would all counsel please</p> <p>12 identify themselves and their firm affiliation for the</p> <p>13 record.</p> <p>14 MR. GUEVARA: Mauricio Guevara for the</p> <p>15 plaintiff.</p> <p>16 MR. SCHULZ: This is Karl Schulz for the</p> <p>17 defendant.</p> <p>18 THE VIDEOGRAPHER: Thank you.</p> <p>19 Madam Court Reporter, you may proceed.</p> <p>20 THE REPORTER: Good morning. This</p> <p>21 deposition of Jaasin Taylor is being conducted remotely</p> <p>22 via Zoom. The witness is located at 600 Travis Street,</p> <p>23 Houston, Texas 77002.</p> <p>24 My name is Patricia Palmer, Texas CSR No.</p> <p>25 9042 representing the firm Veritext, located at 300</p> <p style="text-align: right;">Page 4</p>
<p>1 INDEX</p> <p>2 PAGE</p> <p>3 Appearances..... 2</p> <p>4 Stipulations..... 4</p> <p>5 JAASIN TAYLOR</p> <p>6 Examination by Mr. Schulz ..... 5</p> <p>7 Signature and Changes ..... 98</p> <p>8 Reporter's Certificate..... 99</p> <p>9 EXHIBITS</p> <p>10 NO. DESCRIPTION PAGE</p> <p>11 Exhibit 1..... 10</p> <p>12 Amended Depo Notice - Plaintiff</p> <p>13 Exhibit 2..... 36</p> <p>14 DEFENDANTS 000328 - 000351</p> <p>15 Exhibit 3..... 42</p> <p>16 Mayor Depo.Exhibit 0003 - Taylor's File</p> <p>17 Exhibit 4..... 79</p> <p>18 EMAILSND</p> <p>19 Exhibit 5..... 87</p> <p>20 2021 0818 Plaintiff's OP</p> <p>21 REQUESTED DOCUMENTS/INFORMATION</p> <p>22 NO. DESCRIPTION PAGE</p> <p>23 1..... 46</p> <p>24 Last Filed Tax Return</p> <p>25 2..... 52</p> <p>26 2013 Tax Return</p> <p style="text-align: right;">Page 3</p>	<p>1 Throckmorton Street, Fort Worth, Texas.</p> <p>2 I am administering the oath and reporting</p> <p>3 the deposition remotely by stenographic means from my</p> <p>4 residence within the State of Texas.</p> <p>5 Mr. Taylor, would you please raise your</p> <p>6 right hand.</p> <p>7 Do you solemnly swear or affirm that you're</p> <p>8 in fact Jaasin Taylor and the testimony you'll give in</p> <p>9 this cause will be the truth, the whole truth, and</p> <p>10 nothing but the truth so help you God?</p> <p>11 THE WITNESS: I do.</p> <p>12 THE REPORTER: Thank you. You may lower</p> <p>13 your hand.</p> <p>14 Couple, you may proceed.</p> <p>15 JAASIN TAYLOR,</p> <p>16 having been first duly sworn, testified as follows:</p> <p>17 EXAMINATION</p> <p>18 BY MR. SCHULZ:</p> <p>19 Q. Good morning, sir. Would you please say and</p> <p>20 spell your full name?</p> <p>21 A. My first name is Jaasin, it is spelled</p> <p>22 J-A-A-S-I-N. My last name is Taylor and it is spelled</p> <p>23 T-A-Y-L-O-R.</p> <p>24 Q. Do you have a middle name, sir?</p> <p>25 A. Mathew.</p> <p style="text-align: right;">Page 5</p>

<p>1 Q. Is that what would coquille be known as a strip 2 club?</p> <p>3 A. I'm sorry?</p> <p>4 Q. Is that what would be coquille known as a scrip 5 club?</p> <p>6 A. A gentleman's club.</p> <p>7 Q. A gentleman's club?</p> <p>8 A. Yes.</p> <p>9 Q. Are there topless female dancers in there?</p> <p>10 A. Female dancers. You can't be topless there, 11 no.</p> <p>12 Q. Okay. So there is no nudity there?</p> <p>13 A. No nudity.</p> <p>14 Q. Have you ever worked at a club where there is 15 either partial or full nudity?</p> <p>16 A. Yes.</p> <p>17 Q. What were the names of those clubs?</p> <p>18 A. In West Palm Beach, Florida. It was for 19 Cheetah's -- or Cheetah's.</p> <p>20 Q. When did you work there?</p> <p>21 A. 2004 until 2012, I believe.</p> <p>22 Q. And what did you do at Cheetah's?</p> <p>23 A. I'm sorry?</p> <p>24 Q. What did you do at Cheetah's?</p> <p>25 A. I was a manager.</p> <p style="text-align: right;">Page 30</p>	<p>1 Q. Okay. Besides the SOB arrest, have you been in 2 trouble with the law?</p> <p>3 A. I'm sorry?</p> <p>4 Q. Besides the SOB arrest, any other trouble with 5 the law?</p> <p>6 A. A couple of other things. I don't recall them 7 all. I do have a -- let me see. I was arrested in 1998 8 for an arson charge and hindering a prosecution.</p> <p>9 Q. Where was that?</p> <p>10 A. In New York.</p> <p>11 Q. What was the outcome of that 1998 charge?</p> <p>12 A. I ended up receiving jail time.</p> <p>13 Q. How long?</p> <p>14 A. Five years.</p> <p>15 Q. Did you serve five years?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Was that time served in New York?</p> <p>18 A. Yes.</p> <p>19 Q. Did you have a period of probation or community 20 supervision after that?</p> <p>21 A. Yes, I was on a parole.</p> <p>22 Q. Did you complete the parole successfully?</p> <p>23 A. Yes.</p> <p>24 Q. Was the arson a felony?</p> <p>25 A. Yes, it was.</p> <p style="text-align: right;">Page 32</p>
<p>1 Q. Any other gentleman's clubs that you've worked 2 at?</p> <p>3 A. In Houston, Vivid Live.</p> <p>4 Q. How long did you work at Vivid Live?</p> <p>5 A. From 2013 to 2020.</p> <p>6 Q. And what did you do at Vivid Live?</p> <p>7 A. Manager.</p> <p>8 Q. Any other gentleman's clubs?</p> <p>9 A. Not that I recall.</p> <p>10 Q. So I gather at some point you moved from 11 Florida to Texas?</p> <p>12 A. Yes.</p> <p>13 Q. What was the reason for the move?</p> <p>14 A. Family.</p> <p>15 Q. Can you elaborate a little bit, please.</p> <p>16 A. My -- my mother -- my mother and my little 17 brother were living in Texas and asked me to move in 18 with them, so, you know, I missed them, they missed me.</p> <p>19 Q. What was the outcome of the SOB arrest?</p> <p>20 A. I'm sorry?</p> <p>21 Q. What was the outcome of the SOB arrest?</p> <p>22 A. Misdemeanor and a fine.</p> <p>23 Q. Did you pay the fine?</p> <p>24 A. Eventually, I did, yes. A court cost or a 25 court fine.</p> <p style="text-align: right;">Page 31</p>	<p>1 Q. What was it that was set on fire?</p> <p>2 A. It was a vehicle.</p> <p>3 Q. Whose vehicle was it?</p> <p>4 A. Acquaintance.</p> <p>5 Q. What were the circumstances of the incident?</p> <p>6 A. I was young. I was young, silly, and made a 7 basic mistake. And it was an insurance job on it, what 8 you call an insurance job, set a fire to somebody's 9 vehicle.</p> <p>10 Q. So the idea was to set a fire to the vehicle 11 and collect the insurance proceeds from the fire?</p> <p>12 A. Not me personally, but someone else, yeah.</p> <p>13 Q. Other than the 1998 arson charge, any other 14 criminal incidents?</p> <p>15 A. Not that I recall.</p> <p>16 MR. SCHULZ: Lonn, can you please bring up 17 328 to 351 court records.</p> <p>18 Q. BY MR. SCHULZ: While he's doing that 19 Mr. Taylor, can you tell me about your managerial duty 20 at Cheetah's?</p> <p>21 A. Yes. Wait. What do mean, my daily operations?</p> <p>22 Q. Yes, sir. What -- what does it mean to manage 23 the club?</p> <p>24 A. Basically you're in charge of the registers, 25 just to make sure the registers were -- were charged,</p> <p style="text-align: right;">Page 33</p>

<p>1 CORRECTION PAGE</p> <p>2 WITNESS NAME: JAASIN TAYLOR DATE: 01/24/2023</p> <p>3 PAGE LINE CHANGE REASON</p> <p>4 _____</p> <p>5 _____</p> <p>6 _____</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 SIGNATURE PAGE</p> <p>19</p> <p>20 I, JAASIN TAYLOR, have read the foregoing</p> <p>21 deposition and hereby affix my signature that same is</p> <p>22 true and correct, except as noted above on the</p> <p>23 correction page</p> <p>24</p> <p>25 _____</p> <p>JAASIN TAYLOR</p> <p>Page 98</p>	<p>1 for, related to, nor employed by any of the parties in</p> <p>2 the action in which this proceeding was taken, and</p> <p>3 further that I am not financially or otherwise</p> <p>4 interested in the outcome of the action.</p> <p>5 Certified to by me this 26th day of January, 2023.</p> <p>6</p> <p>7</p> <p>8</p> <p>9  PATRICIA PALMER, Texas CSR 9042</p> <p>10 Expiration Date: 07/31/2024</p> <p>11 Firm Registration No. 571</p> <p>12 Veritext</p> <p>13 300 Throckmorton Street, Suite 1600</p> <p>14 Fort Worth, Texas 76102</p> <p>15 817.336.3042</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 100</p>
<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE SOUTHERN DISTRICT OF TEXAS</p> <p>3 HOUSTON DIVISION</p> <p>4 JAASIN TAYLOR §</p> <p>5 Plaintiff, §</p> <p>6 VS. § CIVIL ACTION NO. 4:21-cv-03173</p> <p>7 BALL CORPORATION §</p> <p>8 Defendant. §</p> <p>9 REPORTER'S CERTIFICATION</p> <p>10 DEPOSITION OF JAASIN TAYLOR</p> <p>11 TAKEN JANUARY 24, 2023</p> <p>12 I, Patricia Palmer, Certified Shorthand Reporter in</p> <p>13 and for the State of Texas, hereby certify to the</p> <p>14 following:</p> <p>15 That the witness, JAASIN TAYLOR, was duly sworn by</p> <p>16 the officer and that the transcript of the oral</p> <p>17 deposition is a true record of the testimony given by</p> <p>18 the witness;</p> <p>19 I further certify that pursuant to FRCP Rule</p> <p>20 30(e)(1) that the signature of the deponent was</p> <p>21 requested by the deponent or a party before the</p> <p>22 completion of the deposition and that the signature is</p> <p>23 to be returned within 30 days from date of receipt of</p> <p>24 the transcript. If returned, the attached Correction</p> <p>25 and Signature Page contains any changes and the reasons</p> <p>therefor.</p> <p>I further certify that I am neither counsel</p> <p>Page 99</p>	<p>1 Mguevara@txattorneys.com</p> <p>2 January 26, 2023</p> <p>3 RE: Taylor, Jaasin v. Ball Corporation</p> <p>4 DEPOSITION OF: Jaasin Taylor (# 5663480)</p> <p>5 The above-referenced witness transcript is</p> <p>6 available for read and sign.</p> <p>7 Within the applicable timeframe, the witness</p> <p>8 should read the testimony to verify its accuracy. If</p> <p>9 there are any changes, the witness should note those</p> <p>10 on the attached Errata Sheet.</p> <p>11 The witness should sign and notarize the</p> <p>12 attached Errata pages and return to Veritext at</p> <p>13 errata-tx@veritext.com.</p> <p>14 According to applicable rules or agreements, if</p> <p>15 the witness fails to do so within the time allotted,</p> <p>16 a certified copy of the transcript may be used as if</p> <p>17 signed.</p> <p>18 Yours,</p> <p>19 Veritext Legal Solutions</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 101</p>